

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Sajjad Quabili

GENERAL INFORMATION:

Name:	TI Group Automotive Systems, LLC
Address:	1070 Kentucky Highway 356 Cynthiana, KY 41031
Date application received:	1/29/2007
SIC Code/SIC description:	3317, Steel Pipe and Tubes
Source ID:	21-097-00011
Source A.I. #:	1769
Activity ID:	APE20070001
Permit:	F-07-016

APPLICATION TYPE/PERMIT ACTIVITY:

<input type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input checked="" type="checkbox"/> Conditional major
<input type="checkbox"/> Administrative	<input type="checkbox"/> Title V
<input type="checkbox"/> Minor	<input type="checkbox"/> Synthetic minor
<input type="checkbox"/> Significant	<input checked="" type="checkbox"/> Operating
<input checked="" type="checkbox"/> Permit renewal	<input type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input type="checkbox"/> Not major modification per 401 KAR 51:001, 1(116)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☐ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)	Potential (tpy)
PM/PM ₁₀	0.208	23.813
SO ₂	0.0000084	12.787
NO _x	0.0014	28.35
CO	0.0012	23.813
VOC	36.362	90*
HAPs		
Toluene	0.0	2.33

* Source wide VOC emission limit is 90 tpy

SOURCE DESCRIPTION:

TI Group Automotive Systems makes metal tubing. At the source, steel is shaped, welded, annealed, and leak tested. The tubes made may also be copper plated or coated with Galfan (an aluminum and zinc mixture) and paint. In line #1, a scrubber is utilized to control emissions from the copper plating unit and the acid cleaning prior to coating. Emissions from the paint application are emitted uncontrolled.

COMMENTS:

TI Group applied to the Division to renew their Conditional Major operating permit. The permittee accepted source wide VOC emission limit of 90 tons per year voluntarily to avoid major source status. Emission Point # 7 was decommissioned recently.

Scrubber at Line 1

Operating procedure recommended by the manufacturer for the scrubber is not available. Therefore, the operating limits and specific monitoring requirements for the scrubber have been added to the permit. The assumed control efficiency of the scrubber is 90%.

Applicable regulations

Regulation 401 KAR 59:010, New process operations, is applicable to the 4 tube coating lines and the 3 wire brush machines since the affected facilities commenced after July 2, 1975. Particulate emissions from the process are minimal.

401 KAR 59:010 is also applicable to the welding and pipe cutting operations since the operations commenced after July 2, 1975. Particulate emissions from the process are minimal.

Precluded regulations

401 KAR 59:225, New miscellaneous metal parts and products surface coating operations, does not apply to the coating lines because the source has taken a VOC emission limit to remain below the regulation emission trigger level.

401 KAR 59:185, New solvent metal cleaning equipment, does not apply to the parts washer because the source has taken a VOC emission limit to remain below the regulation emission trigger level.

401 KAR 61:015, Existing indirect heat exchangers does not apply to the boilers because each boiler has a heat input capacity less than one million BTU/hr and they were commenced before April 9, 1972.

40 CFR 63, Subpart M-MMM-National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products is not applicable due to the low hazardous air pollutant potential at the source.

EMISSION AND OPERATING CAPS DESCRIPTION:

The source-wide emission limit for VOC is 90 tons per year.